



Patrick W. Turner
General Counsel-South Carolina
Legal Department

AT&T South Carolina
1600 Williams Street
Suite 5200
Columbia, SC 29201

T: 803.401.2900
F: 803.254.1731
patrick.turner.1@att.com
www.att.com

January 14, 2009

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Determinations
Docket No. 2008-408-C

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Motion for Clarification and/or Reconsideration in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Attachment
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BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2008-408-C

IN RE: AT&T South Carolina's Petition Requesting)
the Commission's Intervention in Numbering)
Resources Determinations) DOCKET NO. 2008-408-C
)

MOTION FOR CLARIFICATION AND/OR RECONSIDERATION

In Order No. 2008-857, the Commission directed the North American Numbering Plan Administrator ("NANPA") to make certain numbering assignments. As explained below, however, NANPA has stated its belief that it is the Pooling Administrator ("PA"), and not NANPA, that must provide that relief. AT&T South Carolina, therefore, respectfully requests that the Public Service Commission of South Carolina ("the Commission") either: (1) clarify that Order No. 2008-857 requires NANPA and/or the Pooling Administrator (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T South Carolina two consecutive thousands-blocks in the Mt. Pleasant exchange that do not begin with a 9 or a 0 as soon as possible; or (2) reconsider Order No. 2008-857 in light of NANPA's stated belief and issue an order on reconsideration requiring NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to

do so) to provide AT&T South Carolina two consecutive thousands-blocks in the Mt. Pleasant exchange that do not begin with a 9 or a 0 as soon as possible.

BASIS FOR MOTION

AT&T South Carolina filed its original Petition in this Docket on October 29, 2008. Shortly after the Petition was filed, representatives of NANPA contacted AT&T South Carolina and explained that because this Petition addressed thousand-number blocks and not entire codes, NANPA believed the Petition should have requested relief from the PA and not NANPA. As the Commission knows, AT&T South Carolina periodically files similar petitions with the Commission requesting relief that will allow AT&T South Carolina to meet the specific numbering requirements of a customer, and resolution of these Petitions often are time-sensitive from the customer's perspective.

Accordingly, AT&T South Carolina drafted the Amended Petition and the associated Proposed Order it submitted in this docket with the goal of avoiding delays that could arise if, in the future, AT&T South Carolina sought relief against NANPA when NANPA believes it should have sought relief against the PA, or vice versa. AT&T South Carolina's Amended Petition therefore, points out that while numbering determinations are made by NANPA and/or the PA depending on the nature of the numbering request, the FCC's rules addressing these matters generalize responsibilities of NANPA and the PA under the heading "Central office code administration."¹ The Amended Petition also points out that the FCC's Orders addressing these matters allow

¹ See AT&T South Carolina's Amended Petition at 1.

for challenges of determinations by both entities.² The Amended Petition and AT&T South Carolina's Proposed Order,³ therefore, ask the Commission to direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T South Carolina two consecutive thousands-blocks in the Mt. Pleasant exchange that do not begin with a 9 or a 0 as soon as possible.

AT&T South Carolina requested this language in order to avoid any delay that could arise if NANPA believes the PA is the appropriate entity to provide the requested numbering resources or vice-versa, and to make clear that the Commission is directing either or both entities to take any steps necessary to carry out the Commission's Order. AT&T South Carolina respectfully submits that because both NANPA and the PA were served the Amended Petition and the Proposed Order, no person or entity is prejudiced by including such language in the Order addressing the Amended Petition.

CONCLUSION

For the reasons set forth above, AT&T South Carolina respectfully requests that the Commission either: (1) clarify that Order No. 2008-857 requires NANPA and/or the Pooling Administrator (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T two consecutive thousands-blocks in the Mt. Pleasant exchange that do not begin with a 9 or a 0 as soon

² *See Id.*

³ As indicated on the respective certificates of service, AT&T South Carolina served its Amended Petition and its associated Proposed Order on both NANPA and the PA.

as possible; or (2) reconsider Order No. 2008-857 in light of NANPA's stated belief and issue an order on reconsideration requiring NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide AT&T two consecutive thousands-blocks in the Mt. Pleasant exchange that do not begin with a 9 or a 0 as soon as possible.

Respectfully submitted this 14 January, 2009



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
803-401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Motion for Clarification and/or Reconsideration in Docket No. 2008-408-C to be served by the method indicated below upon the following this January 14, 2008:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(Electronic Mail)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(Electronic Mail)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
8385 Yahley Mill Rd.
Richmond, VA 23231
(Electronic Mail)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Electronic Mail)

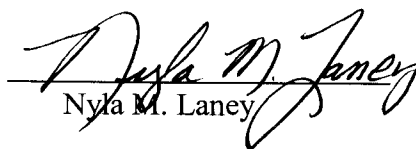
Ms. Amy Putnam
Director-Neustar National Pooling Administrator
1800 Sutter Street
Suite 780
Concord, CA 94520
(Electronic Mail)

F. David Butler, Esquire
General Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

Jocelyn G. Boyd, Esquire
Staff Attorney
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
jocelyn.boyd@psc.sc.gov
(Electronic Mail)

Joseph Melchers
Chief Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(Electronic Mail)

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
(Electronic Mail)


Nyla M. Laney